

- 114 | Page 3.3-41, Table 3.3-6  
This table should be 3.3-14, not 3.3-6. We have the same comments on this table, and the analysis, that we had for the preceding section in the Hoover to Parker reach.
- 115 | Page 3.3-41, 3.3.4.5.3  
paragraph 2: The Flood Control alternative should incorporate the 400,000 af in transfers from the 4.4 Plan. Also, the last sentence brings up the new issue of flows being within the range of historic flows in this portion of the river without examining the change in likelihood of the flow occurring, or an increase in the number of years that flow could occur. There is also the effects to groundwater from these changes in the flows, and this could have significant effects to riparian vegetation in the floodplains. These are effects that were part of the lake elevation analysis, and should also be addressed here. This is another example of the lack of analysis provided by this document to enable the reader to understand the effects to the river area..
- 116 | Pages 3.3-42 to 3.3-43, Figures 33.20a-d  
We have the same comments on these figures, and the analysis in the text that we had for the preceding section on the Hoover to Parker reach.
- 117 | Page 3.3-44, Table 3.3-15  
We have the same comments on this table, and the analysis, that we had for the preceding section in the Hoover to Parker reach.
- 118 | Page 3.3-44, 3.3.4.5.4  
paragraph 2: From the figures, it would appear that the highest frequency for flood flows is under the Flood Control alternative, not the Shortage Protection.
- 119 | Pages 3.3-45 to 3.3-46, Figures 33.21a-d  
We have the same comments on these figures, and the analysis in the text that we had for the preceding section on the Hoover to Parker reach.
- 120 | Page 3.3-47, 3.3.4.5.4  
paragraph 1: While the frequency of flows to Mexico may be higher in the baseline condition until 2015, it is lower for liberal surplus alternatives during the same time period. This is because Mexico can only get a surplus when the extant flood control criteria kick in, a situation based on water levels being higher than the flood storage levels needed.
- 121 | Table 3.3-16: We have the same comments on this table, and the analysis, that we had for the preceding section in the Hoover to Parker reach. Also, the explanation for the zero figures in many of the columns does not make sense. If you have 10 af/month, how can it round down to zero? This is why an explanation of what mean monthly flows are would have been helpful earlier.
- 122 |
- 114: The numbering of Table 3.3-6 in section 3.3.4.5.2 has been changed to Table 3.3-14. Also, see response to Comment 57-110.
- 115: In the FEIS, the Flood Control Alternative was modeled using California intrastate transfers. See response to Comment 37-11 for additional discussion. The difference in flows between historical conditions and surplus alternatives is minimal, and does not warrant the analysis proposed.
- 116: Also, see response to Comment 57-108.
- 117: Also, see response to Comment 57-110.
- 118: Excess flows are expected to occur more frequently under the Flood Control Alternative than under the other alternatives. Subject paragraph has been modified to reflect this.
- 119: Also, see response to Comment 57-108.
- 120: Section 3.16 contains a more detailed discussion of flows entering Mexico.
- 121: Also, see response to Comment 57-108.
- 122: Analyzed flows were actually zero. The minimum 10 af/month (approximately 0.168 cfs) amount was added to keep the model and post-processing from yielding an error message if the algorithm or equation involved dividing by the river amount (i.e., you cannot divide by zero). The note has been removed to avoid confusion.

## 3.4: Water Supply

- 123 | General Comment: This section also lacks an interconnected interpretation of results of the analysis of effects. Different sections are not integrated to provide an understanding of how the various results work together to provide the analysis. Issues such as likelihood of shortages are discussed in the water use projection process before the results of the analysis are presented. This section needs rewriting for clarity and usefulness to the reader.
- 124a | Page 3.4-1, 3.4.2  
paragraph 1: All future depletions should be considered as cumulative effects and not a part of the baseline. How much of the presently unused water is not covered by a valid water service contract (Lower Basin only)?
- 124b |
- 125 | Page 3.4-4, Figure 3.4-1  
We assume that Arizona's (and in similar graphs, California's and Nevada's) projected use of surplus water past 2015 represents their desires and not any probability of that water being available.
- 126 | Page 3.4-5, 3.4.3.2  
paragraph 1: The information on CAP allocations falling is not presented in Figure 3.4-1. Why does CAP decline after 2020?
- 127 | paragraph 2: We suggest that the surplus depletions be given as the amount over the 2.8 maf allocation. Saying the surplus depletions are, for example, 2.96 maf instead of 160,000 af implies that the surplus amount is 2.96 maf. Why does the first level shortage condition rise over time? Is this a result of the increased probability of shortages?
- 128 | paragraph 4: Since the non-Indian agricultural CAP users are not at present pumping groundwater (since they have CAP available), groundwater levels should be stabilizing or rising. Stating that any future use would increase the overdraft does not take into account this fact, or the other management activities taking place in groundwater management areas.
- 129 | Page 3.4-7, 3.4.3.3  
paragraph 1: Earlier in the DEIS, it said that surplus conditions were declared in 1998-2000. This paragraph implies there were surpluses in 1996-97. More importantly, California was able to get the 800,000 af of water it needed to keep MWD's aqueduct full under the current surplus water criteria. If this is the case, and over the next 15 years the amount California needs to make up decreases due to implementation of the 4.4 Plan, why are additional, more liberal criteria needed at all? This also brings up why an alternative that just provides the necessary amount of water each year to keep MWD whole is not included in the DEIS.
- 130 cont'd below | paragraph 2: California growth, as stated clearly here, is going to increase. In order for it to do so, water must be made available to support the growth. Even maintaining the existing rate
- 123: The DEIS and FEIS identified specific resources that could potentially be impacted by the implementation of the proposed interim surplus criteria. Additional explanation has been added to Section 3.3 and Section 3.4 with respect to the interpretation of the figures in these sections and the meaning of the analysis results. Sections presented in the FEIS adequately describe these resources; associated analyses adequately address the potential impacts.
- 124a: Reclamation does not agree with this comment. The baseline alternative approximated the expected conditions without the project (interim surplus criteria). The potential impact that may result from the proposed interim surplus criteria can only be attributed to the difference in conditions between the baseline and the respective surplus alternative.
- 124b: The state of Arizona is the only Lower Basin state that has apportionment water that is currently not covered by a service contract. However, the exact amount is currently under dispute.
- 125: Figures 3.4-1 through 3.4-4 depict the respective state/basin's projected Colorado River water demand schedules under normal, surplus and shortage conditions.
- 126: Additional language has been added to the seventh paragraph of Section 3.4.3.2.
- 127: The discussion centers on the full surplus schedule, not the amount over the normal schedule. The 1st level shortage schedule for Arizona has nothing to do with the probability of shortages. It is derived by subtracting the amount CAP would be shorted under a level 1 shortage from 2.8 maf.
- 128: Comment noted; the paragraph has been restated.
- 129: Comment noted; the paragraph has been restated. Surplus criteria were developed to cover a wider range of hydrologic conditions than those between 1996 and 2000. Also, surplus conditions will benefit all Lower Basin States, not just the Metropolitan Water District.
- 130: Please see Section 1.1.3 for a description of the purpose and need for this action.